

REED SMITH LLP
James C. McCarroll
John C. Scalzo
Christopher A. Lynch
599 Lexington Avenue
New York, NY 10022-7650
Telephone: (212) 521-5400
Facsimile: (212) 521-5450
Email: jmccarroll@reedsmith.com
jscalzo@reedsmith.com
clynch@reedsmith.com

Attorneys for T1 Global Fund Ltd.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Fairfield Sentry Limited, *et al.*,

Debtors In Foreign Proceeding.

Fairfield Sentry Limited, *et al.* (In Liquidation), acting by
and through the Foreign Representatives thereof,

Plaintiffs,

-against-

Theodoor GGC Amsterdam, *et al.*,

Defendants.

Fairfield Sentry Limited, *et al.* (In Liquidation), acting by
and through the Foreign Representatives thereof,

Plaintiffs,

-against-

ABN AMRO Schweiz AG a/k/a ABN AMRO
(Switzerland) AG, *et al.*,

Defendants.

Chapter 15 Case

Case No.: 10-13164 (SMB)

Jointly Administered

Adv. Pro. No. 10-03496 (SMB)

Administratively Consolidated

Adv. Pro. No. 10-03635 (SMB)

Fairfield Sentry Limited, *et al.* (In Liquidation), acting by
and through the Foreign Representatives thereof,

Plaintiffs,

-against-

ABN AMRO Schweiz AG a/k/a ABN AMRO
(Switzerland) AG, *et al.*,

Defendants.

Adv. Pro. No. 10-03636 (SMB)

**NOTICE OF JOINDER OF T1 GLOBAL FUND LTD. IN INDIVIDUAL
SUPPLEMENTAL BRIEF (CONCERNING PREEMPTION)**

Defendant T1 Global Fund Ltd., through its undersigned counsel, hereby joins in and adopts the positions set out in Argument Section I of the Individual Supplemental Brief of defendant Sumitomo Trust and Banking Co., Ltd. filed as ECF 36 on 1/26/17 in *Fairfield Sentry Ltd. (In Liquidation), et al. v. The Sumitomo Trust & Banking Co., Ltd.*, Adv. Pro. No. 10-03863.

CONCLUSION

For all the foregoing reasons set forth and incorporated by reference herein, the Court should deny the Liquidators' Motion for Leave to Amend and dismiss the Complaint with prejudice.

Dated: Janaury 27, 2017
New York, New York

REED SMITH LLP

By: /s/ Christopher A. Lynch
James C. McCarroll
John C. Scalzo
Christopher A. Lynch
599 Lexington Avenue
New York, NY 10022-7650
Telephone: (212) 521-5400
Facsimile: (212) 521-5450
Email: jmccarroll@reedsmith.com
jscalzo@reedsmith.com
clynch@reedsmith.com
Attorneys for T1 Global Fund Ltd.

CERTIFICATE OF SERVICE

I certify that on January 27, 2017, a true and correct copy of the foregoing Notice of Joinder was filed by Reed Smith LLP electronically with the Court through its ECF System. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system.

By: /s/ Christopher A. Lynch
Christopher A. Lynch